



NOTICE OF INTENT TO REMEDIATE

For DEP Use Only

PF # _____

Rem ID # _____

Date: January 21, 2026

NIR Status:

☐ New☒ Revised

Act 1995-2 requires four general information items to be included in the NIR: the general location, listing of contaminants, intended use of property, and proposed remediation measures. In addition, indicate the standard(s) to be obtained and attach a scaled site map (if available). Certain project amendments or changes will require submission of a revised NIR, a new public notice, and a new notification to the municipality. Changes to information marked by (**) or (††) indicate when a new NIR and new public and municipal notices are needed. DEP should also be notified of any significant changes to the initial NIR submission, including the change of future use of the property, contaminants added or removed, change of standards from site-specific to background or Statewide health, any change in the media being investigated, or change of any contact information.

Property Name Post-September 2012 Release South of Former 870 UnitFormer Name(s)/AKA Former Philadelphia Energy Solutions RefineryAddress/Location 3144 W. Passyunk AvenueCity Philadelphia Zip Code 19145**Municipality(s) Philadelphia County(ies) Philadelphia CountyTax Parcel ID# (if known) 884097045Latitude N39 ° (deg). 54 ' (min) 46.16 " (sec)Longitude W75 ° (deg). 11 ' (min) 45.57 " (sec)Horizontal Collection Method GISHorizontal Reference Datum NAD83 Reference Point see Figure 1 attached☐ **Wish to participate in the DEP/EPA [One Cleanup Program](#).Contact the Land Recycling Program Manager for details at landrecycling@pa.gov.

EPA ID#, if known _____

DEP ID#(s), if known 51-33620, eFACTs PF No. 883479

(i.e., eFACTs primary facility ID#, storage tank facility ID#, water quality permit #, etc.)

Date Release Occurred (if known) Unknown (Post-September 2012)Date each municipality was notified of any plan or report submitted under any remediation standard
April 28, 2025 (initially submitted under SHS)Place the newspaper name and date that your notice of your plan/report submission was published
The Philadelphia Inquirer, January 23, 2026

** A change in municipality, the addition of a new municipality, or deciding to participate in the DEP/EPA One Cleanup Program requires a new NIR to be submitted with new public and municipal notifications.

Contamination, Land Usage, and Proposed Remediation Section

Provide a brief description of the site contamination, to the extent known, in plain language (e.g., fuel oil spill, historical chemical industrial area, etc.), the current and intended future use of the property in the box below.

During demolition and redevelopment activities at the former Philadelphia Refinery, light non-aqueous phase liquid (LNAPL), having a release date after September 8, 2012, has been identified South of the Former 870 Unit. In April 2019, Evergreen identified increases in the apparent LNAPL thickness (ANT) in monitoring well S-104. LNAPL had been known to exist in this well as early as 2000 as a result of prior releases being addressed by Sunoco/Evergreen under their Facility-wide Act 2 case. In response to the increase in ANT in 2019, efforts were taken to remove LNAPL from S-104 using a vacuum truck during six separate events in 2021. LNAPL was observed to re-enter the well at a measurable thickness in follow-up gauging events.

The specific mechanism of the release(s) is not known, but it does not appear to be associated with discrete releases from ASTs, which have now been demolished and removed. The Post-2012 release (i.e., LNAPL) is often located in the same general areas as LNAPL that is considered Pre-Existing Contamination (e.g., was release prior to September 8, 2012). LNAPL that was released prior to September 8, 2012 is being addressed by Evergreen as Pre-Existing Contamination.

LNAPL was also observed in nearby well S-368 between 2016 and 2021. LNAPL was not observed in this well in gauging events after May 2021. S-368 was decommissioned in October 2022.

Remedial investigation sampling and characterization work conducted by BDH in 2025 demonstrated that the extent of the remaining Post-2012 release-related contamination is limited to benzene in soil and benzene and naphthalene in groundwater. The subsurface investigation demonstrated that LNAPL is no longer present at the Site.

The Facility is undergoing redevelopment activities, and the anticipated future use will be non-residential.

Provide a general description of proposed remediation measures.

As discussed above, following additional remedial investigation sampling and characterization by BDH, it was determined that the extent of remaining Post-2012 release-related contamination is limited to benzene in soil and benzene and naphthalene in groundwater. The subsurface investigation determined that LNAPL is no longer present at the Site.

BDH intends to remediate Post-2012 release-related contamination in soil and groundwater (i.e., benzene and naphthalene) at the Site not meeting the applicable Statewide Health MSCs, to the Site-Specific Standard (SSS) via pathway elimination (i.e., engineering and institutional controls).

Standards Selection Section

Check all the boxes that apply for the appropriate contaminant groups according to the standard(s) and media of the remediation to be performed.

NOTE: Either the site-specific standard or a special industrial area requires a 30-day public and municipal comment period.

Contaminant Groups	Background		Statewide Health—Residential		Statewide Health—Non-Residential		††Site-Specific Standard		††Special Industrial Area	
	Soil	GW	Soil	GW	Soil	GW	Soil	GW	Soil	GW
Aviation Gasoline	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Diesel Fuel	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fuel Oil No. 1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fuel Oil No. 2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fuel Oil No. 4	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fuel Oil No. 5	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fuel Oil No. 6	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Kerosene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Jet Fuel	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Leaded Gasoline	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
New Motor Oil	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Unleaded Gasoline	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Used Motor Oil	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chlorinated Solvents	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inorganics	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lead	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
MTBE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other Organics	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PAHs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PCBs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Pesticides	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PFAS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

GW: groundwater

†† Changing the selected standard from either background or Statewide health to the site-specific standard, changing to a combination of standards that includes the site-specific standard, or choosing the special industrial area designation requires a new NIR submission with new public and municipal notifications.

Please list individual contaminants here, by environmental medium and cleanup standard (optional):

Soil (Site-Specific): benzene
Groundwater (Site-Specific): benzene and naphthalene

Property Owner, Remediator/Participant, and Consultant

Complete the form below for each recipient obtaining a release of liability upon approval of the final report. Attach additional sheets as necessary.

Property Owner

Contact Person/Title Anne R. Garr / Secretary eFACTs Client ID(If Known) Facility No. 51-33620
Phone Number (312) 283-4469 Email Address agarr@hrpgroup.com
Company Name Bellwether District Holdings, LLC EIN or Federal ID # _____
Address (street, city, state, zip) 3144 West Passyunk Avenue, Philadelphia, PA 19145
Client Type (choose from list below) Limited Liability Company

Client Types:

Association/Organization

Authority	Limited Liability Partnership	Partnership-General
County	Municipality	Partnership-Limited
Estate/Trust	Non-Pennsylvania	Pennsylvania Corporation
Federal Agency	Government	School District
Individual	Other (Government)	Sole Proprietorship
Limited Liability company	Other (Non-Government)	State Agency

Consultant

Contact Person/Title Kevin Long/Senior Principal Consultant Email Address kevin.long@terrphase.com
Phone Number 609-236-8171, ext 93 Company Name Terraphase Engineering Inc.
Address (street, city, state, zip) 100 Canal Pointe Blvd, Suite 110, Princeton, NJ 08540

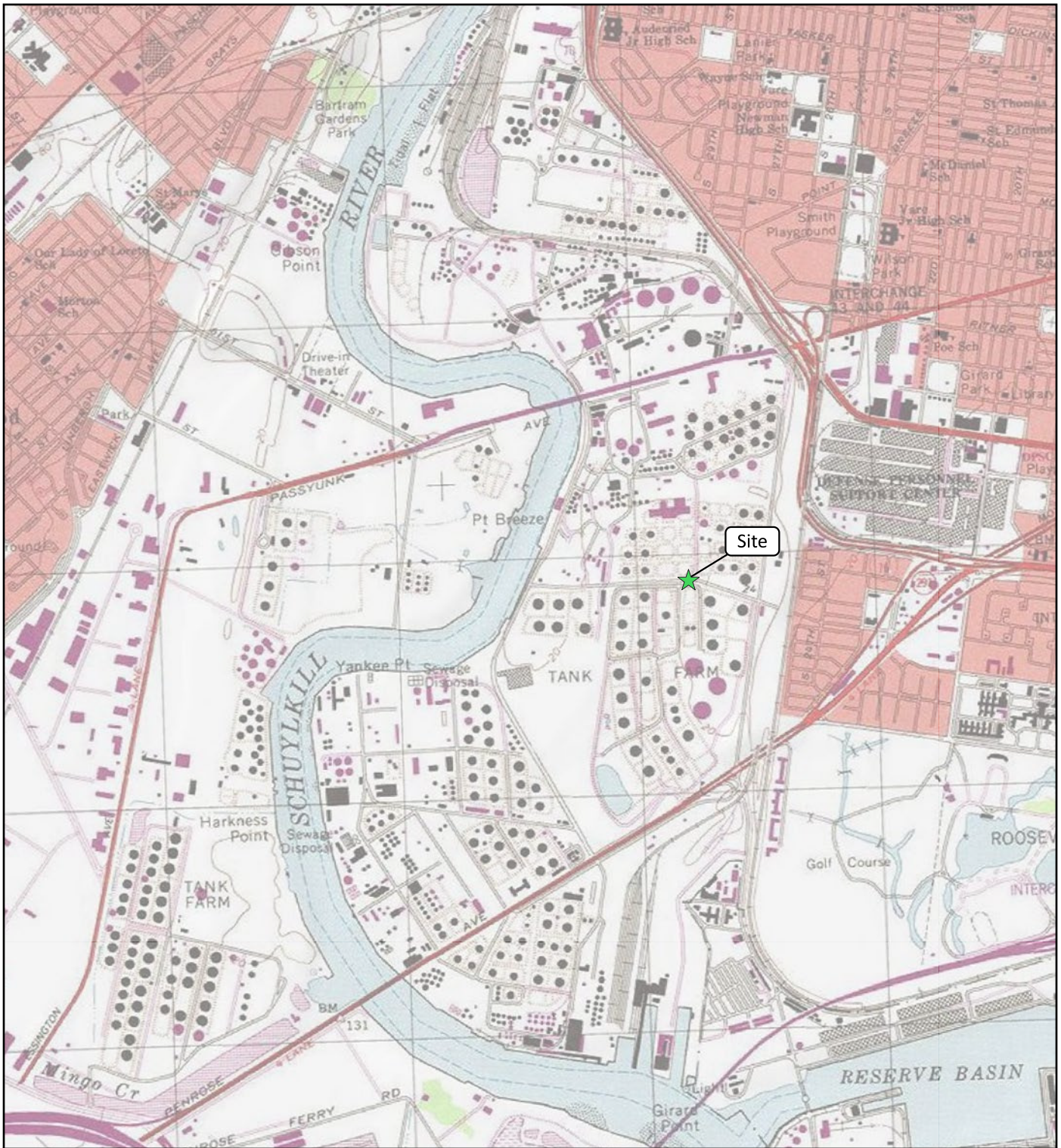
Other Participant (Remediator)

Contact Person/Title Anne R. Garr / Secretary
Relationship to Site Owner
(e.g. remediator, participant in cleanup if other than owner, etc.)
Phone Number (312) 283-4469 Email Address agarr@hrpgroup.com
Company Name Bellwether District Holdings, LLC EIN or Federal ID # _____
Address (street, city, state, zip) 3144 West Passyunk Avenue, Philadelphia, PA, 19145

Preparer of Notice of Intent to Remediate

Name Kevin Long Title Senior Principal Consultant
Phone Number 609-236-8171, ext 93 Email Address kevin.long@terrphase.com
Company Name Terraphase Engineering Inc.
Address (street, city, state, zip) 100 Canal Pointe Blvd, Suite 110, Princeton, NJ 08540

N:\GIS\PA\044.001_PESRM-PES\QGIS\QZ and GPKG\Branch_Act 2 Areas\870 Unit\20250326\QG2328_P044.001_BDH_870Unit.qgz Figure 1 - Site Location 2023-10-17T10:19:57.000 Created by: M.Civittello Checked by: A. Strohl



0 2,000 4,000 Feet
1 Inch = 2000 Feet



Legend

— Property Boundary

SAFETY FIRST



CLIENT:
Bellwether District Holdings, LLC

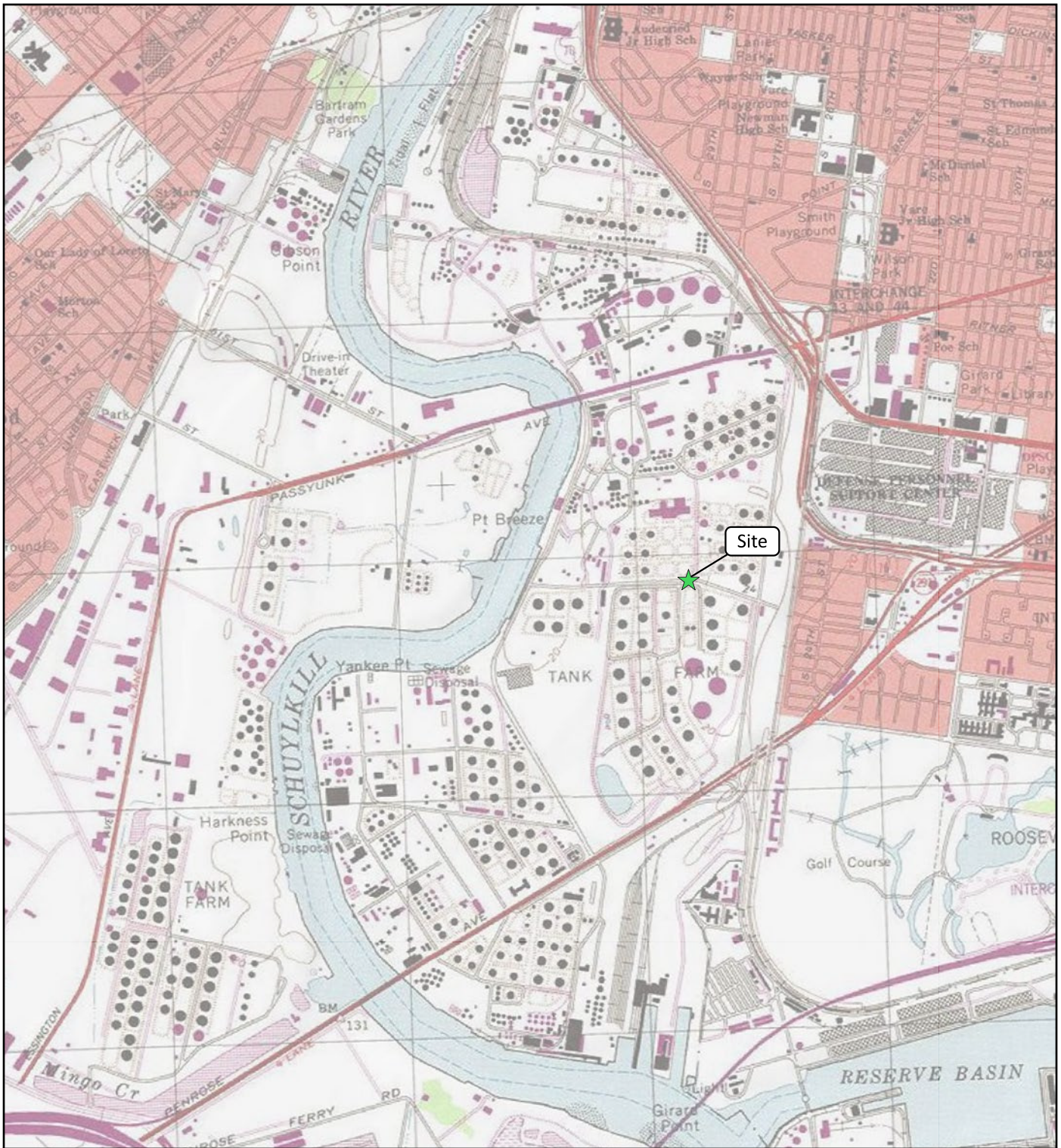
PROJECT:
Area South of 870 Unit

PROJECT NUMBER:
P044.001.014

Site Location

FIGURE 1

N:\GIS\PA\044.001_PESRM-PES\QGIS\QZ and GPKG\Branch_Act 2 Areas\870 Unit\20250326\QG2328_P044.001_BD\870Unit.qgz Figure 1 - Site Location 2023-10-17T10:19:57.000 Created by: M.Civittello Checked by: A. Strohl



0 2,000 4,000 Feet
1 Inch = 2000 Feet



Legend

— Property Boundary

SAFETY FIRST



CLIENT:
Bellwether District Holdings, LLC

PROJECT:
Area South of 870 Unit

PROJECT NUMBER:
P044.001.014

Site Location

FIGURE 1

**Notice of an Intent
to Remediate to an Environmental Standard.
(Sections 302(e)(1)(ii), 303(h)(1)(ii),
304(n)(1)(i), and 305(c)(1))**

Pursuant to the Land Recycling and Environmental Remediation Standards Act, the act of May 19, 1995, P.L. 4, No. 1995-2., notice is hereby given that Bellwether District Holdings, LLC (BDH) will submit to the Pennsylvania Department of Environmental Protection (PADEP), a Notice of Intent to Remediate (NIR) a site located at 3144 West Passyunk Avenue, Philadelphia. This NIR states the site is an area within the former Philadelphia refinery referred to as the Post-September 2012 Release South of Former 870 Unit. The site has been found to be contaminated with petroleum-related constituents in soil and groundwater. BDH has selected to remediate the area to attain the Site-Specific Standards. The proposed future use of the property will be non-residential (i.e., commercial/industrial) use.

The Act provides for a 30-day public comment period for Site-Specific Standard remediations. The 30-day comment period is initiated with the publication of this notice. Until February 22, 2026, the City of Philadelphia may submit a request to BDH to develop and implement a public involvement plan involving the municipality in the development of the remediation and reuse plans for the site. Copies of these requests and of any comments should also be submitted to the PADEP at 2 E Main Street, Norristown, PA 19401.

The Philadelphia Inquirer

100 S. INDEPENDENCE MALL W, STE 600, PHILADELPHIA, PA 19106

Affidavit of Publication

On Behalf of:

TERRAPHASE ENGINEERING
1100 E HECTOR ST
SUITE 400
CONSHOHOCKEN, PA 19428

STATE OF PENNSYLVANIA COUNTY OF PHILADELPHIA:

Before the undersigned authority personally appeared the undersigned who, on oath represented a and say: that I am an employee of The Philadelphia Inquirer, LLC, and am authorized to make this affidavit of publication, and being duly sworn, I depose and say:

1. The Philadelphia Inquirer, LLC is the publisher of the Philadelphia Inquirer, with its headquarters at 100 S. Independence Mall West, Suite 600, Philadelphia, PA 19106.
2. The Philadelphia Inquirer is a newspaper that which was established in in the year 1829, since which date said daily newspaper has been continuously published and distributed daily in the City of Philadelphia, count and state aforesaid.
3. The printed notice or publication attached hereto set forth on attached hereto was published in all regular print editions of The Philadelphia Inquirer on

Legal Notices

as published in Inquirer Legals in the issue(s) of:

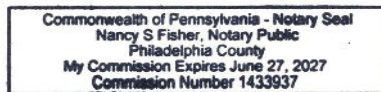
1/23/2026

4. Under oath, I state that the following is true and correct, and that neither I nor The Philadelphia Inquirer, LLC have any is interest in the subject matter of the aforesaid notice or advertisement.



Notary Public

My Commission Expires:



COPY OF ADVERTISEMENT

Notice of an Intent to Remediate to an Environmental Standard. (Sections 302(e)(1)(II), 303(h)(1)(II), 304(n)(1)(I), and 305(c)(1))

Pursuant to the Land Recycling and Environmental Remediation Standards Act, the act of May 19, 1995, P.L. 4, No. 1995-2., notice is hereby given that Bellwether District Holdings, LLC (BDH) will submit to the Pennsylvania Department of Environmental Protection (PADEP), a Notice of Intent to Remediate (NIR) a site located at 3144 West Passyunk Avenue, Philadelphia. This NIR states the site is an area within the former Philadelphia refinery referred to as the Post-September 2012 Release South of Former 870 Unit. The site has been found to be contaminated with petroleum-related constituents in soil and groundwater. BDH has selected to remediate the area to attain the Site-Specific Standards. The proposed future use of the property will be non-residential (i.e., commercial/industrial) use.

The Act provides for a 30-day public comment period for Site-Specific Standard remediations. The 30-day comment period is initiated with the publication of this notice. Until February 22, 2026, the City of Philadelphia may submit a request to BDH to develop and implement a public involvement plan involving the municipality in the development of the remediation and reuse plans for the site. Copies of these requests and of any comments should also be submitted to the PADEP at 2 E Main Street, Norristown, PA 19401.

Ad No: 200468

Customer No: 104799



January 21, 2026

Ms. Leigh Anne Rainford
Program Manager
Philadelphia Department of Public Health
Environmental Health Services
7801 Essington Avenue
Philadelphia, PA 19153

sent via email to LeighAnne.Rainford@Phila.gov and UPS, Proof of Delivery Requested

**Subject: Notice of Intent to Remediate
Post-September 2012 Release South of Former 870 Unit
Former Philadelphia Energy Solutions Refinery
3144 West Passyunk Avenue, Philadelphia, PA 19145**

Dear Ms. Rainford:

The Land Recycling and Environmental Remediation Standards Act (Act 2) requires that a Notice of Intent to Remediate (NIR) be provided to the municipality in which the site is located. Act 2 also provides that when a site is being remediated to the Site-Specific Standard, the municipality is afforded a 30-day comment period. In accordance with the provisions of Act 2, Terraphase Engineering Inc. (Terraphase), on behalf of Bellwether District Holdings, LLC (BDH), is notifying you of BDH's intent to remediate the subject site to the Site-Specific Standard.

A copy of the NIR, which will be sent to the Department of Environmental Protection (DEP), is enclosed. This notice will be published in the Pennsylvania Bulletin, and a summary of the notice will be placed in a local newspaper.

Publication of this notice in a local newspaper initiates the 30-day public and municipal comment period. During this time, your municipality may request a public involvement plan for the community to be involved in the development of the remediation and reuse plans for the site. If the municipality wishes to be involved in this project, please send your comments to me, Kevin Long, at kevin.long@terraphase.com or 609-236-8171, ext. 93, with copies to C. David Brown at the DEP, 2 E. Main Street, Norristown, PA 19401 or via email to cdbrown@pa.gov.

Sincerely,

for Terraphase Engineering Inc.

A handwritten signature in black ink that reads 'Kevin L. Long'.

Kevin L. Long
Senior Principal Consultant

KL:cs

January 21, 2026
Notice of Intent to Remediate
3144 West Passyunk Avenue, Philadelphia, PA 19145

Enclosure: Notice of Intent to Remediate

cc: Julianna Connolly (jconnolly@hrpgroup.com)
Amy Piccone (apiccone@hrpgroup.com)

Proof of Delivery

Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

Tracking Number

1Z75YA670192186863

Service

UPS Next Day Air®

Shipped / Billed On

01/21/2026

Delivered On

01/22/2026 9:47 A.M.

Delivered To

7801 ESSINGTON AVE
PHILADELPHIA, PA, 19153, US

Received By

ANDREW

Delivery Location

Office

Reference Number(s)

P044.001.018E, 75YA67T9L7W

Please print for your records as photo and details are only available for a limited time.

Sincerely,

UPS

Tracking results provided by UPS: 01/23/2026 11:26 A.M. EST